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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TCHUTIMA, INC., a Nevada domestic
corporation doing business as LOTUS OF
SIAM; SAIPIN CHUTIMA, an individual,

Plaintiffs,

v.

BUA GROUP, LLC, a Delaware limited
liability company;

Defendant,

and

PENNAPA CHUTIMA, an individual,

Intervenor.

CASE NO. 2:24-cv-01130-JAD-NJK

**~~[PROPOSED]~~ STIPULATION AND
ORDER TO EXTEND DEADLINE TO
FILE DISPOSITIVE MOTIONS**

[FIRST REQUEST]

[ECF No. 226]

Defendant Bua Group, LLC (“Bua Group”) and Plaintiffs TChutima, Inc. (“TChutima,”)
and Saipan Chutima (“Saipan”) (“Plaintiffs”) and Intervenor Pennapa Chutima (“Penny”)
(collectively the “Parties”), through counsel, pursuant to and in compliance with LR IA 6-1,
stipulate to extend the deadlines for the Parties to file dispositive motions by 45 days:

The Parties hereby stipulate to the following:

1. On March 24, 2025, the Court entered the Stipulation and Order to Extend Discovery
and Dispositive Deadlines [Third Request], setting the deadline for the parties to file
dispositive motions as June 5, 2025. ECF No. 168.

1 2. As of the date of this proposed stipulation, the parties have the following pending
2 motions that may impact the arguments or scope of their respective potential dispositive
3 motions:

4 a. Plaintiffs' Motion to Enforce the Preliminary Injunction, Renewed Request for
5 Sanctions, and Renewed Request for Relief Under 15 U.S.C. § 1116(a) (ECF
6 No. 39);

7 b. Bua Group's Countermotion to Dissolve Order (ECF No. 29) Based on New
8 Facts or, in the Alternative, for an Evidentiary Hearing (ECF No. 95);

9 c. Bua Group's Motion to Dismiss Second Amended Complaint (ECF No. 173);

10 d. Pennapa Chutima's Motion to Disqualify Pisanelli Bice, PLLC from
11 Representing Defendant Bua Group, LLC (ECF No. 200);

12 e. Pennapa Chutima's Motion to Stay Discovery Pending Resolution of Motion to
13 Disqualify Pisanelli Bice, PLLC from Representing Defendant Bua Group, LLC
14 (ECF No. 203); and

15 f. Bua Group's Motion to Compel Plaintiffs to Supplement Privilege Log and
16 Produce Documents in Their Possession, Custody, and Control (ECF No. 204).

17 3. The Parties stipulate to a 45-day extension of time to file dispositive motions, setting
18 deadline to file dispositive motions at July 21, 2025.

19 4. This is the Parties' first request to move the dispositive motion deadline, following three
20 stipulations to extend discovery. *See* ECF Nos. 37, 121, 169.

21 5. This stipulation does preclude any future requests to alter the dispositive motion
22 deadlines.

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6. By executing this stipulation, the Parties do not waive any argument or assertion related to who is authorized to serve as Bua Group's counsel.

DATED this 28th day of May 2025.

Respectfully submitted by:

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ORDER

IT IS HEREBY ORDERED that, with good cause appearing, the parties' stipulation [ECF No. 226] is GRANTED. The parties' deadline to file dispositive motions is extended to July 21, 2025.



U.S. District Judge Jennifer A. Dorsey
June 5, 2025